

REMARKS/ARGUMENTS

Claims 1 - 32 are pending in the subject patent application. Claims 1, 11, 19, and 27 have been amended. Support for the amendments is found in the specification, drawings, and claims as originally filed. Applicant respectfully submits, therefore, that the amendments do not add new matter.

35 U.S.C. § 102 Claim Rejections

Claims 1 – 4, 6 – 12, 15 – 19, and 22 - 31 are rejected as allegedly being anticipated by U.S. Patent 6,782,245 to Lazzarotto et al. (“Lazzarotto”).

Applicant respectfully submits that the present claims as claimed, for example, in claim 1 as amended are not anticipated by Lazzarotto. Claim 1, as amended, includes the following limitations.

A core wireless engine design comprising:

a transceiver

a microprocessor; and

a standardized interface arrangement, the standardized interface

arrangement adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards.

(Claim 1, as amended) (Emphasis added)

Applicant respectfully submits that Lazzarotto does not disclose a standardized interface arrangement that is adapted to be interconnected to a variety of types of host interfaces that implement a plurality of bus standards.

The Examiner has cited Figure 5B, reference 510, and Figure 6B reference 610, of Lazzarotto, together with the related portions of the specification. The cited portion of Lazzarotto discloses the following.

FIG. 5B is a functional block diagram of a multi-player, multi-device, single front-end, wireless peripheral interface including a USB hub in accordance with one embodiment of the present invention. The communication system 501 includes a communication hub 500b and one or more peripheral devices 508a-n. The communication hub 500b includes the antenna 502, the communication front-end, and the processor 506 as described above. The communication hub 500b also includes a USB hub 510. The USB hub 510 couples with the USB port or connection of, for example, the host computer system. The USB hub 510 includes one or more USB ports or connections having the physical and firmware characteristics for connecting one or more USB-compliant devices, for example, a digital camera or a scanner.

(Lazzarotto, col. 10, lines 36 – 50) (Emphasis added)

FIG. 6B is a functional block diagram of a multi-player, multi-device, dual communication front-end, wireless peripheral interface USB connect in accordance with one embodiment of the present invention. The communication system 601 includes a communication hub 600b and one or more peripheral devices 608a-n as described above. The communication hub 600b includes the antennae 602, 603, the communication front-ends 604, 605, and the processor 606 described above. In addition, the communication hub 600b also includes a USB hub 610. The USB hub 610 may couple with the USB port or connection of, for example, the host computer system. The USB connect 510 (sic) may also include one or more USB ports or connections having the physical and firmware characteristics for connecting one or more USB-compliant devices, for example, a digital camera or a scanner.

(Lazzarotto, col. 12, lines 1 – 12) (Emphasis added)

Applicant respectfully submits that the limitation of a standardized interface arrangement adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards is not disclosed in this portion of Lazzarotto or anywhere else in Lazzarotto. Lazzarotto is disclosing only one type of host interface, the USB. Lazzarotto does disclose connecting one or more USB-compliant devices, but these are not different types of host interfaces, but rather simply different devices having the same type of host interface. To address the Examiner's interpretation of Lazzarotto, applicant have amended the claims to clarify that the variety of types of host interfaces implement a plurality of bus standards.

Applicant are confident that the additional limitation clarifies the distinction between Lazzarotto and the invention as claimed. Applicant maintains the position that Lazzarotto only discloses multiple ports for interfacing wireless peripherals. In Lazzarotto, interconnection to multiple wireless peripherals is effected using multiple ports. Lazzarotto does not disclose a "standardized" interface adapted to be interconnected to a variety of types of host interfaces. Lazzarotto does refer to an interface (e.g., interface 100) as having two ports. However, a closer reading of Lazzarotto clearly distinguishes Lazzarotto from the invention as claimed. The "interface" of Lazzarotto cannot be equated with the "interface arrangement" as claimed because the interface of Lazzarotto includes the antenna, the processor, and the front-end

circuitry (e.g., RF front-end circuitry) as well as the ports for interfacing to the wireless peripheral devices.

Moreover, Lazzarotto does not disclose or suggest that either of the ports provides a standardized interface arrangement that is adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards.

Applicant has amended the claims to emphasize this distinguishing characteristic and to clarify that the standardized interface arrangement as claimed is adapted for interconnection, to a variety of types of host interfaces implementing a plurality of bus standards.

For these reasons applicant respectfully submits that claim 1 is not anticipated nor rendered obvious by Lazzarotto. Given that claims 2 – 10 depend, directly or indirectly, from claim 1, applicant respectfully submits that claims 2 - 10, are, likewise, not rendered obvious by Lazzarotto.

Further, given that claims 11, 19, and 27 include the limitation of a standardized interface arrangement that is adapted to be interconnected to a variety of types of host interfaces implementing a plurality of bus standards, applicant respectfully submits that claims 11, 19, and 27 are not anticipated nor rendered obvious by Lazzarotto. Given that

claims 12 – 18, claims 20 – 26, and claims 28 - 32, directly or indirectly, from claims 11, 19, and 27, respectfully, applicant respectfully submits that claims 12 – 18, 20 – 26, and 28 - 32, are, likewise, not anticipated or rendered obvious by Lazzarotto.

In regard to claim 2, Lazzarotto only discloses that functionality disclosed may be incorporated into a hub of varying form factor. Lazzarotto as cited by the Examiner discloses the following.

Generally, the antenna 830 receives one or more communication signals transmitted from the antenna of a transmitter. The receiver 805 is included in a communication front-end to separate the one or more communication signals based on frequency of that signal so that it can be associated with a particular device. Further, the receiver 805 converts the communication signal into a digital data signal. The MCU 815 receives the digital data signal and processes it. More particularly, the MCU 815 decodes the digital data signal, determines if that data signal is valid (e.g., no errors) and from a wireless peripheral within its communication system, converts the data signal into a USB format, and transmits that data signal for the USB port of a host. The host may be any USB enable device. The host interface 825 includes the appropriate connections for coupling with the host.

The disclosure provides a few embodiments for creating, designing, and manufacturing a communication hub including a USB wireless peripheral interface (e.g., 300a, 300b, 400, 500a, 500b, 600a, 600b) in accordance with the present invention. The functionality disclosed may be incorporated into a communication hub of varying form factors. For example, in one embodiment the communication hub may have a form factor of defined by a standards organization such as the Personal Computer Memory Card International Association (PCMCIA) specification or Compact Flash (CF).TM. Association specification. In another embodiment, the communication hub may have a custom form factor of, for example, approximately 10 centimeters by 6 centimeters by 2 centimeters.

(Lazzarotto, column 13, lines 16 -45) (Emphasis added)

A thorough reading of this section of Lazzarotto makes clear that Lazzarotto is referring to alternative embodiments. That is, Lazzarotto discloses only that different embodiments of the invention may be implemented with different form factors. (See Lazzarotto, column 13, lines 35 -45). The Examiner is requested to reread this section Lazzarotto and note the use of the disjunctive conjunction “or” in reference to the proffered alternative embodiments.

In contrast claim 2, provides a core wireless engine designed to fit in a variety of form factor units. This limitation is not disclosed or suggested by Lazzarotto.

For these reasons applicant respectfully submits that claims 2, 3, and 11 – 32 are further distinguished from, and not anticipated nor rendered obvious by, Lazzarotto.

Applicant respectfully submits that neither U.S. Patent 6,539,438 to Ledzius et al., nor US Patent Application 2002/0176223 to Shiozaki remedy the defects of Lazzarotto in regard to the distinguishing limitations as discussed above. None of the cited references, alone or in combination, disclose or suggest the limitation of a standardized interface arrangement that is adapted to be interconnected to a variety of types of host interfaces.

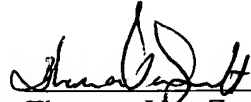
Conclusion

In view of the foregoing, Applicant believes all claims now pending in this Application are in condition for allowance. The issuance of a formal Notice of Allowance at an early date is respectfully requested.

If the Examiner believes a telephone conference would expedite prosecution of this application, please telephone the undersigned at 408-282-1809.

Respectfully submitted,

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